

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TERRY BLASINGAME, MICHAEL
FERRANDO, KATHRYN AND BRIAN
HART, JOHN PRINDLE, DOUGLAS SNOW,
MIKE LUCERO, COLBY MARTINO, NICK
MOHLER, DANIEL ORR, and PATRICK
CHAFFIN, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

MALIBU BOATS, LLC, a Delaware Limited
Liability Company and MALIBU BOATS,
INC., a Delaware Corporation,

Defendants.

C.A. No. 24-648-SB

**DECLARATION OF SEAN GRAY IN SUPPORT OF
DEFENDANTS' MOTION TO STAY DISCOVERY**

I, Sean Gray, declare as follows:

1. I submit this declaration in support of Defendants' motion to stay discovery.
2. I am the MBI product compliance manager at Defendant Malibu Boats, LLC ("Malibu Boats").
3. I am over the age of eighteen and competent to make this declaration. I have personal knowledge of the matters contained in this declaration and, if called to testify as a witness, could and would do so competently.
4. On and around August 4th, 2025, after communications and involvement with, and with the approval of, the U.S. Coast Guard, Malibu Boats sent out an updated safety alert to boat owners. The updated safety alert states that passengers can safely sit in the bow area if boat operators follow enclosed safety information and apply an enclosed warning label to their boats.

5. Attached as **Exhibit A** is a true and correct copy of the updated safety advisory.
6. This declaration is made pursuant to 28 U.S.C. § 1746. I declare under penalty of perjury that the foregoing is true and correct.

September 23, 2025



Sean Gray
MBI Product Compliance Manager